

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: FACEBOOK, INC. CONSUMER
PRIVACY USER PROFILE LITIGATION,

This document relates to:

ALL ACTIONS

MDL NO. 2843

CASE NO. 3:18-MD-02843-VC-JSC

HON. VINCE CHHABRIA
HON. JACQUELINE SCOTT CORLEY
COURTROOM 4 – 17TH FLOOR
SPECIAL MASTER, DANIEL GARRIE, ESQ.

**ORDER REGARDING ADDITIONAL
PROPOSED SEARCH STRINGS FOR
MARK ZUCKERBERG AND SHERYL
SANDBERG CUSTODIAL SOURCES**

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ZUCKERBERG AND SHERYL SANDBERG CUSTODIAL SOURCES**

ORDER

Pursuant to the Amended Order Regarding Search Strings for Mark Zuckerberg and Sheryl Sandberg Custodial Sources, the parties each submitted three additional proposed search terms on June 3, 2022. See Exhibit A (Plaintiffs' Additional Proposed Search Strings) and Exhibit B (Facebook's Additional Proposed Search Strings). On June 6, 2022, the parties submitted their objections to the proposed search strings. See Exhibit C (Plaintiffs' Objections to Search Strings) and Exhibit D (Facebook's Objections to Search Strings). On June 10, 2022 Facebook submitted the results of the richness analysis for each of the additional proposed search strings. Below are the additional search strings proposed by each party and the results of the richness analysis for each search string.

ID	Proposing Party	Search String	Richness Results
1	Plaintiffs	(friend* or fof* or naf*) w/5 (deprec* or whitelist* or whitelist* or data or info* or perm* or exten* or access* or polic*)	1.8%
2	Plaintiffs	(user* or segment or reach* or target* or audience* or direct or custom) w/5 (psychograph* or behavior* or personal* or priva* or impl* or infer* or profil*)	4.6%
3	Plaintiffs	(agreement* or contract* or terms or accept* or agree* or consent* or perm* or grant*) w/50 ((video* or movie*) w/5(upload* or view* or shar* or request* or obtain* or engag* or access* or get or display* or availab* or provide* or integrat* or exten* or watch* or stream* or friend* or identif* or interest* or tag* or conver* or target* or histor* or relat* or "social context" or endpoint* or API*)	7.1%
4	Facebook	(friend* or fof* or naf*) w/8 (deprec* or whitelist* or whitelist* or data or perm*)	11%
5	Facebook	(user* and (control* or setting* or priva*)) w/8 (friend* or info* or data*)	16%
6	Facebook	"custom* audience" w/10 (revenue* or ARPU)	19%

No later than June 24, 2022, Facebook is to produce responsive, non-privileged files that hit on additional search strings 5 and 6. Additionally, Facebook is to perform a richness analysis on the following modified version of search string 4: (friend* or fof* or naf*) w/8 (deprec* or whitelist* or whitelist* or data or perm* or access). If the richness results are 10% or higher, Facebook is to produce

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1 responsive, non-privileged files that hit on this modified version of search string 4, no later than June
2 24, 2022.

3
4 IT IS SO ORDERED.

5
6 June 14, 2022

A handwritten signature in dark ink, appearing to read "Daniel Garrie", is written over a horizontal line.

Daniel Garrie
Discovery Special Master